

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE
ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC; UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

[EMERGENCY]
MOTION TO CLARIFY MATTERS STAYED

1. I hereby submit this motion to clarify matters stayed, as follows.
2. On 11/20/23, I filed a motion for hearing on discovery for the antislapp motion and a motion for hearing on the motions to dismiss.
3. On 11/29/23, the Donais defendants filed objections to the motion for hearing on discovery for the antislapp motion and the motion for hearing on the motions to dismiss.
4. A reply or motion to reply is or would be currently due on 12/6/23.
5. On 12/1/23, after a case management conference on 11/30/23, the court entered a stay on matters related to the motions to dismiss.
6. Given the intent of the stay by the court, I assume or understand that the motion for hearing on discovery for the antislapp motion and the motion for hearing on the motions to dismiss, are also stayed.
7. This is because these two motions directly or otherwise indirectly relate to or affects the briefing on the motions to dismiss or matters pertaining to the motions to dismiss.
8. However, the court's order on 12/1/23 did not appear to address these two motions.
9. The motion for hearing on anti-slapp discovery and the motion for hearing on the motions to dismiss should be stayed, as any reply will be directly related to further briefing on or matters pertaining to the motion to dismiss.
10. I am currently working on the reply to the objection to remand and the motion for jurisdictional discovery pertaining to remand, as discussed at the case management conference, and I have not worked on any replies to the objections to the motions for hearing on anti-slapp discovery and the motion for

hearing on the motions to dismiss. I also have other deadlines that I am working on and so I will not have time to prepare these replies by tomorrow.

11. In the abundance of caution, I am filing this motion for clarification to confirm the stay on these two motions, so that I do not lose any rights or so that I am not prejudiced by missing any deadlines, due to a misunderstanding or inadvertence.
12. I would like to preserve my right to reply to these objections at a later date as necessary, after the stay on matters pertaining to the motions to dismiss is lifted and/or after the motion to amend the complaint is decided.
13. I hope the court can let me know if the replies due on 12/6/23 are stayed, by today if possible so that I can have advance notice of this before the deadline and this is requested to be treated on an expedited basis.
14. Accordingly, I respectfully request that the Court grant this clarification.

Respectfully submitted,
/s/Andre Bisasor
Plaintiff Andre Bisasor

December 5, 2023

CERTIFICATE OF SERVICE

This filing is served to all parties of record via the e-filing system.

/s/Andre Bisasor
Andre Bisasor